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May 23, 2022

**VIA ECF & EMAIL (Failla [NYSDChambers@nysd.uscourts.gov](mailto:NYSDChambers@nysd.uscourts.gov))**

Judge Katherine Polk Failla  
United States District Court  
Southern District of New York  
40 Foley Square, Room 2103  
New York, NY 10007

**MEMO ENDORSED**

**Re: *Martínek v. AmTrust Financial Services, Inc.*, 1:19-cv-08030-KPF (S.D.N.Y.)**

Dear Judge Failla:

Pursuant to the Court's Order for a status update by today (ECF 88), the parties advise as follows:

The parties are continuing to negotiate substantive issues related to the settlement stipulation, have been exchanging drafts of the settlement stipulation, and have also been drafting various attachments to the expected stipulation, such as the class notice documents.

The parties request an additional 30 days to finalize the papers. Under this proposal, once a stipulation is executed, the parties will promptly advise the Court and propose a date to submit preliminary approval papers.

The parties are available at the Court's convenience should Your Honor have any questions.

Respectfully submitted,

**WOLF POPPER LLP**

*/s/ Adam J. Blander*

*Class Counsel*

Respectfully submitted,

**QUINN EMANUEL URQUHART  
& SULLIVAN, LLP**

*/s/ Kevin S. Reed*

*Counsel to Defendants*

Application GRANTED. The parties shall file a letter proposing a date for the submission of their preliminary approval briefing on or before **June 23, 2022**.

The Clerk of Court is directed to terminate the motion at docket entry 89.

Dated: May 24, 2022  
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE